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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIALS
SHOULD BE SEALED**

Judge: Hon. Vince Chhabria
Special Master Daniel Garrie
Courtroom: 4, 17th Floor

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to Consider Whether Another Party's Materials Should be Sealed (the "Motion") and all supporting papers. Having considered the supporting declaration of the designating party, Facebook, Inc., and GOOD CAUSE APPEARING, the Court GRANTS Plaintiffs' Administrative Motion and ORDERS that the following documents remain filed under seal:

	Documents	Portions Sought to be Sealed	Evidence Offered in Support of Sealing	Ruling
1	Full 30(b)(6) Deposition Transcript of Konstantinos Papamiltiadis (February 23, 2021) [Exhibit 31 to the Joint Declaration of Derek W. Loeser and Lesley E. Weaver in Support of Plaintiffs' Motion for Sanctions]	Confidential Portions: 6: 14-16, 20-23 46: 10-12 48: 4-11, 15-17, 20-25 49: 1-10, 17-19 50: 10-13, 19-24 51: 9-16 53: 1-25 54: 1-3 56: 14-25 57: 1-12 58: 8-25 59: 1-25 60: 1-25 61: 1-21 62: 3-25 63: 1-20 64: 12-25 65: 1-25 66: 1-5, 19-23, 25 67: 1-11, 15-25 68: 1-25 69: 1-25 70: 1-12, 20-25 71: 1-8, 13-25 72: 1-9, 20-25 73: 1-13, 17-20 74: 25 75: 1-25 76: 1-10 77: 18-25	Defendant to provide evidence, per Local Rule 79-5(f)	

		78: 1-20 79: 17-25 80: 1-2, 11-25 81: 1-19 82: 14-24 83: 3-25 84: 1-25 85: 1-25 86: 1-25 87: 1-16 88: 13-21, 24-25 89: 1-25 90: 1-25 91: 1-25 92: 1-25 93: 15-25 94: 1-8, 18-25 95: 1-25 96: 1-25 97: 1-25 98: 1-8, 21-22 100: 4-21 101: 7-25 102: 1-8, 16-24 104: 11-25 105: 1-25 106: 1-25 107: 1-25 108: 1-12 110: 2-5 111: 12-17 113: 13-23 114: 24-25 115: 1 116: 17-25 123: 9-20 124: 6-17 125: 17-25 129: 10-25 130: 1-25 131: 1-25 132: 1-25 133: 1-25 134: 1-25 135: 1-12, 25 136: 1-12 143: 4-6, 18-25		
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		144: 1-25 145: 1-2 146: 11-16 148: 10-16 149: 4-6, 10-12 152: 4-25 153: 1-25 154: 1-25 155: 1-18 159: 15-25 160: 1, 14-20, 23-25 161: 1-9, 13-25 162: 3-22 163: 3-7 164: 9-25 165: 1-17, 22-25 166: 1-14, 20-22, 24-25 167: 3-15, 23-25 168: 1, 13-19 169: 12-23 179: 21-23, 25 180: 1-4, 6-16, 19-20, 22-25 181: 2, 10-16, 18-25 182: 1-2, 8-13, 15-17, 19-21, 23-25 183: 1-17 188: 14-20 197: 12-16 198: 17-25 199: 1-8 201: 6-14 210: 11-25 211: 1-25 212: 1-6 217: 14-19, 21-24 218: 2-5, 8-12, 16-25 219: 1-25 220: 1-13 221: 7-25 222: 1-9 223: 3-17, 21-25 224: 1-25 225: 2-25 226: 1-15 229: 1-25		
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		230: 1-25 231: 1-25 232: 1-25 233: 1-25 234: 1-14 237: 3-25 238: 1-6 239: 3-25 240: 1-3 245: 1-25 246: 1-25 247: 1-25 248: 1-25 249: 1-23 259: 1-25 260: 1-4, 6-22 263: 7-25 264: 1-21 265: 21-23 267: 3-13 268: 2-25 269: 1-25 270: 1-3, 19-25 271: 1-25 272: 1-25 273: 1-9 277: 20-25 Pages 1-50 of the Word Index Highly Confidential: 6: 17-19 240: 4-25 241: 1-25 242: 1-19 243: 3-25 244: 1-25		
2	Full 30(b)(6) Deposition Transcript of Michael Duffey (June 2, 2022) [Exhibit 95 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental	38:14-19 39:12-40:25 41:6-7 41:14-42:19, 42:22 43:19-22, 43:25 44:1-21 46:7-47:18, 47:25 48:1-9, 48:13-15 49:1-25	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information;	

	Sanctions Brief]	50:10-52:2 52:22-55:16 56:9-58:2 58:11-63:17 64:17-65:4 65:16-66:4 66:14-15, 66:20-67:4 69:11-25 70:11-14 72:21-73:5 73:18-21 75:10-20 77:17-21 79:1-17 82:23-83:6 83:12-84:9 85:15-22 86:15-18 93:21-94:3 96:21-97:3 97:8-10 126:5-11 154:3-24 156:6-22 158:1-19 161:1-11 163:24-164:6 165:15-20 168:18-169:2 173:1-5 178:20-23 184:5-9 Errata: Page/Line Corrections at 39:16, 69:15-21, 79:1-4	Defendant to provide evidence, per Local Rule 79-5(f)	
3	Full 30(b)(6) Deposition Transcript of Isabella Leone (August 5, 2022) ¹ [Exhibit 98 to the Declaration of Lesley E. Weaver in Support	Entire document	Defendant to provide evidence, per Local Rule 79-5(f)	

¹ The rough version of the Leone 30(b)(6) Deposition Transcript was originally filed as Exhibit 98, Dkt. No. 988-16. Here, Plaintiffs provide the Court with the final version.

	of Plaintiffs' Supplemental Sanctions Brief]			
4	Full 30(b)(6) Deposition Transcript of Michael Clark (May 18, 2022) [Exhibit 103 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Sanctions Brief]	19:3-5, 19:7-8, 19:14-15 25:21-24 34:12-15, 34:19-20, 34:25-35:3, 35:15, 35:17 36:1-3, 36:8-18, 36:21-22 37:2-10, 37:17-21 40:13-14, 40:16-21 41:4-14 48:2-6, 48:17-19 52:18, 52:20-22 53:4-9, 53:12-21 54:4-7, 54:14 57:1-4, 57:7-10, 57:13, 57:16, 57:18, 57:20-24 58:14-16, 58:25-59:2, 59:22-23 60:2-8, 60:15-19 61:2-7 62:1-5, 62:9-19 65:24-25 67:8-16, 67:19-22, 67:25-68:10, 68:17-25 69:5-8, 69:13-17, 69:24-70:1, 70:3-7, 70:13-14, 70:16-20, 70:23-25 71:2-4, 71:10-16, 71:21-22 72:15-23 73:2-10 74:6, 74:14-15, 74:18-23, 74:25 75:10-11, 75:24-76:7, 76:12-13, 76:19-20, 76:22-23 78:11, 78:14-19 79:1-2, 79:4, 79:23-80:2, 80:16-17, 80:19-20 81:9-10 82:5-7 83:4-5	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)	

		84:9 85:12, 85:14-22, 85:24 86:11 87:20 93:12-15, 93:20-21 95:19-20 97:3-4, 97:6, 97:10-11 98:13-14 99:2-3, 99:6-10, 99:17-18, 99:25- 100:4, 100:12, 100:14- 17 101:7-14, 101:18-20 102:4, 102:8-10, 102:25 103:13, 103:18-19 105:16 108:7-10, 108:16-18, 108:24-109:6 111:9-11, 111:22-25 112:3-8, 112:11, 112:21 113:5-11, 113:19, 113:23-24 114:16, 114:19, 114:21 115:1-2, 115:6-8, 115:25-116:2, 116:8- 18 131:24 132:5-8, 132:10-11, 132:25-133:2 134:20-21 136:24-137:3, 137:6- 7, 137:17-138:15 139:12, 139:17, 139:19-140:1, 140:5- 11, 140:23 141:1-142:10, 142:12- 17, 142:19, 142:21-22 143:6-23 144:10, 144:12-14 158:13-14, 158:19, 158:24-159:9, 159:22 160:19-20, 160:22 161:14-162:3 164:22-24 165:1, 165:5-11, 165:13-16, 165:23-24 166:3, 166:12-13, 166:16-18, 166:24-		
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5	Full 30(b)(6) Deposition Transcript of Simon Cross (May 9, 2022) [Exhibit 105 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Sanctions Brief]	Confidential Portions: 26:15-21 29:8-14 43:18-23 50:10-16 56:13 56:16 56:20 56:24 57:16-21 60:7-16 62:15-63:3 74:6-11 76:3-11 77:10-78:20 78:22-79:3 80:5-81:3 81:19-82:1 96:10-21 113:18-21 126:8-12 128:9-15 128:25-129:1 129:17-130:11 130:18-20 131:2-9 132:4-9 132:16-25 136:5-7 170:9-10 170:13 170:16 170:20 174:15-21	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information or Highly Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)	

		183:9-15; Highly Confidential Portions: 93:13-18 94:9-19 95:10-25 96:24-97:1 100:5-9 116:18 117:4-6 117:10-16 117:19-118:8 118:15-18 119:9-12 120:18 177:8		
6	Full 30(b)(6) Deposition Transcript of Amy Lee (February 24, 2021) [Exhibit 116 to the Declaration of Lesley E. Weaver in Support of Plaintiffs' Supplemental Sanctions Brief]	6:12–13, 16–18 10:23 11:1, 4, 6, 10–11, 14 18:18–19, 24–25 19:1 22:21–25 23:4–9, 12–19 62:5–13 79:20–25 80:1–4, 13–25 81:1–25 82:1–7, 11–17, 19– 24 83:1–5, 7–16, 23–24 84:1–6, 15–24 85:6–24 86:2–25 87:1–8, 11–19, 21– 25 88:1–11, 14–20, 22– 25 89: 1–18, 21–25 90:1–3, 9–13, 16–25 91:1–19, 21–25 92: 3–6, 8–13, 16– 23, 25 94:1–8, 11–25 95:2–11, 13–25 96:1–8, 11–25	Pursuant to the Stipulated Protective Order (Dkt. 122), Defendant designated portions as Confidential Information; Defendant to provide evidence, per Local Rule 79-5(f)	

		97:1–23 98:1–25 99:1–25 100:1–4, 6–25 101:1–25 102:1–20, 22–25 103:1–25 104:1–7, 9–14, 16–25 105:1–4, 6–25 106:1–3, 5–25 107:1–25 108:1–16, 18–24 109:3–25 110:1–15 111:1–25 112:1–25 113:1–8, 11–17 114:13–22 150:24–25 151:1–6, 8–15 156:8–16 178:15–25 179:1–25 180:1–11, 15–25 181:1–25 182:1–7, 17–25 183:1–6, 8–19, 23–25 184:1–13, 15–19, 22–25 185:1–9, 12–20, 22–25 186:2–4, 6–12, 15–20, 22–25 187:2–19, 22–25 188:1–7, 10–25 189:1–11, 14–15, 19–25 190:1–4, 7–24 191:2–5, 7–17, 20–25 192:1–14, 16–25 193:2–12, 15–25 194:1–21, 23–25 195:1–25 196:1–25		
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IT IS SO ORDERED.

Date: _____

VINCE CHHABRIA
United States District Judge